



U.S. Department of Justice

*United States Attorney
Northern District of New York*

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March 17, 2009

Hon. Norman A. Mordue
Chief Judge
PO Box 7336
100 S. Clinton Street
Syracuse, NY 13261

Re: U.S. v. Kashif Shepard, et al., 08-MJ-468

Dear Chief Judge Mordue:

Please let this letter serve as the Government's motion to schedule and conduct plea hearings for several defendants in the above-captioned matter, all of whom are currently charged by Complaint with conspiracy to possess with intent to distribute cocaine and cocaine base (crack), in violation of 21 U.S.C. § 846. We ask that the Speedy Trial clock be tolled until the conclusion of the plea hearings for these defendants pursuant to 18 U.S.C. § 3161(h)(1)(F) and (I). The defendants in question include the following: Kashif Shepard, Christopher Lagasse, Gino Placanica, Jason Julian, Michael Williams and Timothy Sweezey (hereinafter collectively referred to as "the defendants").¹ The attorneys for all six defendants join in this motion and the parties jointly request

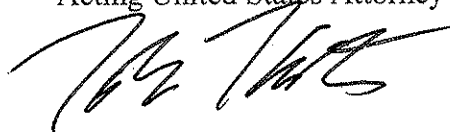
¹ In addition to the defendants, thirteen others were also charged in the same Complaint. Twelve of them have been indicted (with one of them, Hugh Hill, already pleading guilty), and the other was dismissed from the Complaint in favor of local prosecution.

that the hearings be scheduled at least three weeks from the date of this motion.

The reason for this request is that the parties for all six defendants are in various stages of finalizing plea agreements with the government and they need the additional time to finalize the details of the pleas. It should be noted that defendant Timothy Sweezey has not ultimately decided whether to enter such a plea, but he is currently pondering the government's offer. Should he reject the Government's offer, Sweezey's counsel and the Government will promptly notify the Court prior to the scheduled plea date and Sweezey will be indicted into the conspiracy.

Very truly yours,

Andrew T. Baxter
Acting United States Attorney

A handwritten signature in black ink, appearing to read 'John M. Katko', is written over the typed name and title.

By: John M. Katko
Assistant U.S. Attorney

cc: Clarence Johnson, Esq. (Counsel for Timothy Sweezey)
Simon Moody, Esq. (Counsel for Michael Williams)
Leslie Lewis, Esq. (Counsel for Jayson Julian)
Lisa Gilels, Esq. (Counsel for Gino Placanica)
Richard Marris, Esq. (Counsel for Christopher Lagasse)
George Hildebrandt, Esq. (Counsel for Kashif Shepard)